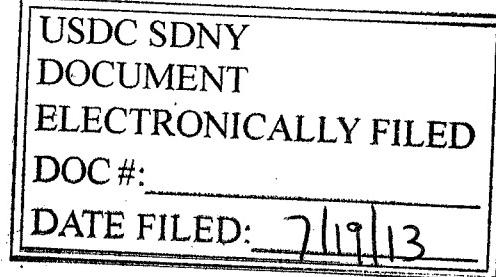
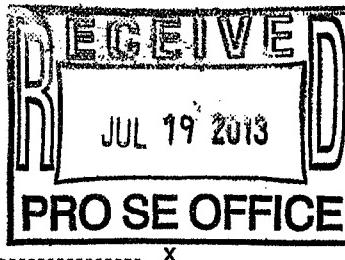


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK



CHRISTOPHER WALKER,

Plaintiff

12 Civ. 0432 (LTS) (AJP)

LINKLATERS LLP

Defendant

PLAINTIFF'S
MANDATORY INITIAL DISCLOSURES
PURSUANT TO F.R.C.P. 26(a)(1)

I, Christopher Walker (Plaintiff), make the following initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure. I reserve the right to supplement these disclosures during the course of discovery and as my investigation continues as required by Rule 26(e)(1)(A) of the Federal Rules of Civil Procedure.

(A) Rule 26(a)(1)(A)(i) Disclosures — Identities of Individuals Likely to Have Discoverable Information

The name and addresses, where known, of each individual who, through oral depositions, may have discoverable information that I (Plaintiff) may use to support my Claim against the Defendant.

Name/Known Address	Subject Area(s) of Testimony
Christopher Walker Pro Se Plaintiff	(i) Plaintiff's claims in the Complaint; and (ii) the circumstances concerning Plaintiff's employment with the Defendant, e.g., official duties, responsibilities and work performance, unofficially assumed duties and responsibilities, and other working conditions.

Docket #: 12 Civ. 0432 (LTS) (AJP)

Name/Known Address	Subject Area(s) of Testimony
Nelly Muñoz, currently employed with Defendant <i>c/o Linklaters LLP, via Foley & Lardner LLP</i>	(i) Corroborate certain allegations and claims in the Complaint; and (ii) Corroborate Plaintiff's official duties, responsibilities and work performances, and unofficially assumed duties and responsibilities, and other working conditions.
Audra Johnson-Davis currently employed with Defendant <i>c/o Linklaters LLP, via Foley & Lardner LLP</i>	(i) Corroborate certain allegations and claims in the Complaint and other working conditions observed.
Tariqah Adams currently employed with Defendant <i>c/o Linklaters LLP, via Foley & Lardner LLP</i>	(i) Corroborate certain allegations and claims in the Complaint and other working conditions observed.

(B) Rule 26(a)(1)(A)(ii) Disclosures — Relevant Evidence Within Defendant's Control

A description by category and location of all documents, electronically stored information, and tangible things in the possession, custody and control of Linklaters, that I (Plaintiff) may use to support my Claim against the Defendant.

Location	Categories
Linklaters LLP 1345 Avenue of the Americas New York, NY 10105	(i) Email correspondences regarding allegations and claims in the Complaint, e.g., correspondences between Plaintiff and Helen Kitson, Plaintiff and Jonathan Lace, Plaintiff and Michael Brock; (ii) Emails pertaining to the Document Production Department's training and evaluations, including such records created and managed by Nelly Muñoz; (iii) Plaintiff's score results of Document Production Department's training and evaluations, including such records created and managed by Nelly Muñoz; (iv) Firm's policies, procedures and instructions for the Annual Composite Appraisal procedure; (v) Records of Annual Composite Appraisal contributions by appraisers elected by Plaintiff.

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(C) Rule 26(a)(1)(A)(iii) Disclosures — Computation of Damages

As provided to opposing counsel via email correspondence on July 15, 2013 at 04:40pm, a request for a punitive award of \$325,000.00, a total approximation of five years of my last noted annual salary, for the loss of past commensurate raises and bonuses and presumed future economic rewards, e.g., to be vested with the firm.

(D) Rule 26(a)(1)(A)(iv) Disclosures — Insurance/Indemnity Agreements

Not applicable.

(E) Rule 33 Discovery — Interrogatories to Parties

Requests for additional and specific information from the Defendant (such as exact employment start date, dates of promotions and particular rewards, and pay salaries of certain current and previous employees) will be addressed via interrogatories during the remainder of this Discovery process.

Dated: Irvington, New Jersey
July 19, 2013

By: Christopher Walker
Christopher Walker
361 Vermont Ave., #C
Irvington, NJ 07111
chriswalkernj@comcast.net
862 371 9548

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORKCHRISTOPHER WALKER

(In the space above enter the full name(s) of the plaintiff(s)/petitioner(s).)

12 Civ. 0432 (LTS) (AJP)

- against -

AFFIRMATION OF SERVICE

LINKLATERS LLP

(In the space above enter the full name(s) of the defendant(s)/respondent(s).)

I, Christopher Walker, declare under penalty of perjury that I have

(name)

served a copy of the attached Plaintiff's Mandatory Initial Disclosures

(document you are serving)

upon Jonathan L. Israel whose address is _____

(name of person served)

Foley & Lardner LLP, 90 Park Avenue, New York, NY 10016

(where you served document)

by email (see reverse side of this sheet for confirmation copy) and U.S. Certified Mail:
(how you served document: For example - personal delivery, mail, overnight express, etc.)Dated: Irvington, NJ
(town/city) (state)July 19, 2013
(month) (day) (year)
Signature

361 Vermont Ave., #C

Address

Irvington, NJ

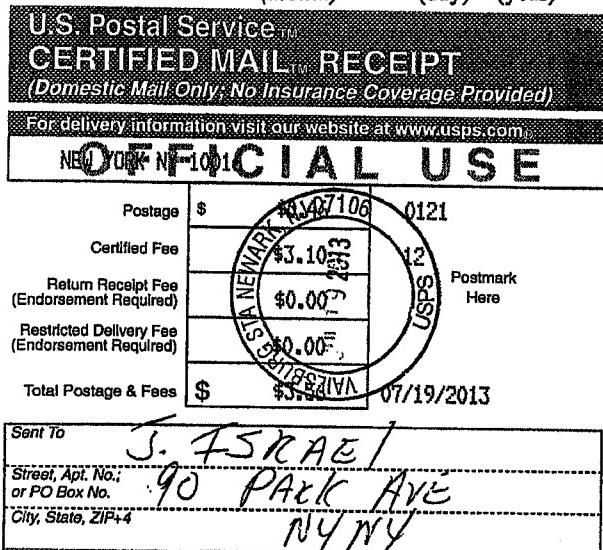
City, State

07111

Zip Code

862 371 9548

Telephone Number



From: Christopher Walker <chriswalkernj@comcast.net>
Subject: Matter 12 Civ. 0432 (LTS)(AJP) — Disclosures
Date: July 19, 2013 11:59:14:000 AM
To: jisrael@foley.com
• 1 Attachment, 1.4 MB

Good Day, Mr. Israel:

As per Judge Peck's order, please find attached an electronic copy of my Initial Disclosures. An original hard copy is en route to your office via Certified U.S. Mail.

Thanks!

CW


[NYSD | My M...pdf \(1.4 MB\)](#)



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
Pro Se Office

SCANNED

To: The Honorable Magistrate Judge Andrew J. Peck,
From: S. Coretto, Pro Se Intake Clerk, Docket Services, Ext. 1177
Date: 7/22/2013

Re: Walker v. Linklaters LLP, 1:12-cv-00432-LTS-AJP

The attached document, which was received by this Office on 7/19/2013, has been submitted to the Court for filing. The document is deficient as indicated below. Instead of docketing the document for public access, it has been docketed as a court-view only docket entry. I am forwarding it to you for your consideration. See Fed. R. Civ. P. 5(d)(2)(B), (4).

- () No original signature.
() No Affirmation of Service/ Proof of Service.
(X) Other: Plaintiff submits Discovery Material.

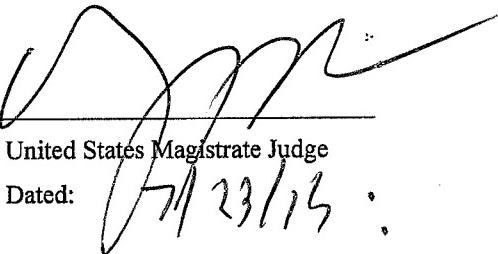
If you memo-endorse the filing, you do not need to return this memorandum to the Pro Se Office. Once your memo-endorsement is docketed and filed, all ECF users on the case will be notified.

In the alternative, please return this memorandum with the attached papers to this Office, indicating at the bottom what action should be taken.

ACCEPT FOR FILING

RETURN TO PRO SE LITIGANT

Comments:

United States District Judge
Dated:

United States Magistrate Judge
Dated: 7/23/13

HON. ANDREW J. PECK
United States Magistrate Judge
Southern District of New York